

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS

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SEKO Worldwide, LLC,

Case No. \_\_\_\_\_

Plaintiff,

Hon. \_\_\_\_\_

v.

Removed from the Circuit Court of Cook  
County, Illinois, Case No. 2015-L-010482

CK Technologies, LLC,

Defendant.

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**NOTICE OF REMOVAL**

Defendant CK Technologies, LLC, by its attorneys Varum LLP, files this Notice of Removal based on diversity jurisdiction pursuant to 28 U.S.C. §§ 1332, 1441, and 1446, with respect to Case No. 2015-L-010482 in the State of Illinois, Circuit Court of Cook County, Law Division. In support of this notice, Defendant states:

1. On or about October 14, 2015, Plaintiff filed a Complaint in the Circuit Court of Cook County, Illinois entitled *SEKO Worldwide, LLC v. CK Technologies, LLC*. See attached **Exhibit A**.

2. Plaintiff's Complaint alleges breach of contract and unjust enrichment related to services purportedly provided by SEKO to CK Technologies.

3. Plaintiff is a Delaware limited liability company with its principal place of business in Itasca, Illinois. **Exhibit A, ¶ 2**.

4. Defendant is a Michigan limited liability company with its principal place of business in Montpelier, Ohio. **Exhibit A, ¶ 3**.

5. Complete diversity exists between Plaintiff and Defendant in this matter.

6. Upon information and belief, Plaintiff seeks damages in excess of the \$75,000 jurisdictional limit based on its allegation that the amount of the allegedly unpaid invoices exceeds \$800,000.

7. This Court has diversity jurisdiction over this matter because the parties are citizens of different states and the amount in controversy is in excess of \$75,000, exclusive of interest and costs. 28 U.S.C. § 1332.

8. Defendant's Notice of Removal is timely filed within 30 days of service of Plaintiff's Complaint.

9. Venue is proper in this Court pursuant to 28 U.S.C. §§ 1441(a) and 1446(a) because it is the district court and division within which Plaintiff's state action is pending.

10. Defendant has served Plaintiff with a Notice of Filing for this Notice of Removal, a copy of this Notice of Removal, and has filed the same with the Clerk of the Circuit Court of Cook County, Illinois as required by 28 U.S.C. § 1446(d).

WHEREFORE, Defendant CK Technologies, LLC removes to this Court this action now pending before the Circuit Court of Cook County, Illinois.

Respectfully submitted,

**V**ARNUM

Attorneys for Defendant

Dated: November 12, 2015

By: /s/ Charyn K. Hain

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